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Attorney for Defendant JUAN LUIS SOSA TAMAYO

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA, : Case No. 2:20-cr-00194-JAD-DJA

10 :
11 Plaintiff, :
12 :
13 v. : **STIPULATION TO CONTINUE**
14 : **SENTENCING**
15 :
16 Defendants. :
17 :

18 **IT IS HEREBY STIPULATED AND AGREED**, by and between Eric C. Schmale,
19 Assistant United States Attorney, counsel for the United States (hereinafter "the Government"),
20 and Thomas F. Pitaro, counsel for defendant Juan Sosa Tamayo (collectively, "the Parties"), that
21 the sentencing scheduled for April 10, 2023, at 3:00 p.m., be vacated to a date and time
22 convenient to the court, but preferably on May 15, May 16, or May 17, 2023 .
23

24 The Stipulation is entered into for the following reasons:

- 25 1. The additional time requested herein is not sought for purposes of delay.
26 2. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, needs additional time to
27 prepare for sentencing.
28 3. Counsel has spoken to Defendant and he has no opposition to the continuance.

4. Counsel has spoken to the Government and he has no opposition to the continuance.

5. The parties agree to the continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendants sufficient time within which to be able to effectively prepare for sentencing, taking into account the exercise of due diligence.

7. Denial of this request for continuance would deny counsel for sufficient time to effectively represent the defendant.

This is the third Stipulation to continue the sentencing and related dates in this matter.

DATED: This 4th day of April 2023.

PITARO & FUMO, CHTD.

JASON M FRIERSON
UNITED STATES ATTORNEY

By /s/ Thomas Pitaro
THOMAS F. PITARO
Counsel for Defendant Juan Sosa Tamayo

By /s/ Eric Schmale
Eric C. Schmale
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, : Case No. Case No. 2:20-cr-00194-JAD
Plaintiff, :
v. :
JUAN LUIS SOSA TAMAYO et. al, : **ORDER**
Defendants. :
:

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested herein is not sought for purposes of delay.
 2. Counsel Thomas Pitaro, attorney for Juan Sosa Tamayo, needs additional time to prepare for sentencing.
 3. Counsel has spoken to Defendant and he has no opposition to the continuance.
 4. Counsel has spoken to the Government and he has no opposition to the continuance.
 5. The parties agree to the continuance.
 6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendants sufficient time within which to be able to effectively prepare for sentencing, taking into account the exercise of due diligence.
 7. Denial of this request for continuance would deny counsel for sufficient time to effectively represent the defendant.

This is the third Stipulation to continue the sentencing and related dates in this matter.

ORDER

IT IS THEREFORE ORDERED that the sentencing currently set for April 10, 2023 at 3:00 p.m., is vacated and continued to May 16, 2023, at 11:00 a.m.

DATED this 4th day of April, 2023.

UNITED STATES DISTRICT JUDGE